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June 10, 2016

Laura E. Krishnan
Stinson Leonard Street LLP
150 South Fifth Street, Suite 2300
Minneapolis, MN 55402

VIA MESSENGER

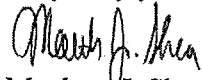
Re: Prince Rogers Nelson

Dear Laura:

Enclosed is an Affidavit of Tyka Nelson Regarding Protocol Prior to Potential Genetic Testing, along with a certified copy of Tyka's birth certificate as Exhibit A.

Please let us know if you need any additional information on this.

Very truly yours,



Matthew J. Shea

MJS/lal
Enclosures
cc: Brian A. Dillon (w/enclosure)

GP:4477234 v1

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
PROBATE DIVISION
FIRST JUDICIAL DISTRICT

Court File No. 10-PR-16-46

Estate of

AFFIDAVIT OF TYKA NELSON
REGARDING PROTOCOL PRIOR TO
POTENTIAL GENETIC TESTING

Prince Rogers Nelson,
Decedent.


STATE OF MINNESOTA }
COUNTY OF HENNEPIN } ss.

Tyka Nelson, being first duly sworn on oath, states and alleges as follows:

1. My full name is Tyka Evene Nelson. My first name is spelled "Tika" on my birth certificate. Despite that, my parents always spelled my first name "Tyka" and I have always used that spelling.
2. My date of birth is May 18, 1960.
3. I was born in Minneapolis, Minnesota.
4. A true and accurate copy of my birth certificate is attached as Exhibit A.
5. My parents full names are Mattie Della (Shaw) and John Lewis Nelson.
6. My parents were married when I was born.
 - a. My parents were married on August 31, 1957.
 - b. My parents were married in Northwood, Iowa.
 - c. My biological mother's maiden name was Shaw.
 - d. I understand that Stinson Leonard Street/the Special Administrator has requested a certified copy of my parent's marriage certificate.
 - e. My parents were divorced on September 24, 1968. A true and accurate copy of their divorce decree is attached as Exhibit B.
7. No other man is presumed to be my father under any of the presumptions found in Minn. Stat. § 257.55.

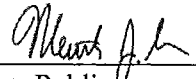
- 8. My biological mother was not married to any man other than my father when I was born or within 280 days before I was born.
- 9. I have obtained and provided a certified copy of my birth certificate. Stinson Leonard Street/the Special Administrator has requested a certified copy of my parent's marriage license and already has a certified copy of my parent's divorce decree. All of these documents prove the above stated information.

FURTHER AFFIANT SAYETH NOT



 Tyka Nelson

SUBSCRIBED and SWORN to before me
on this 9th day of June.



 Notary Public Minnesota (State)
 My Commission Expires: 1/31/2019

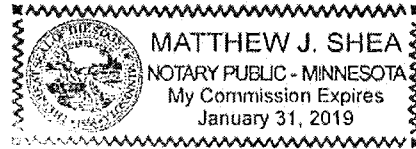


EXHIBIT A

Tyka Nelson Birth Certificate

STATE OF MINNESOTA
CERTIFICATION OF VITAL RECORD

BIRTH CERTIFICATE

FULL NAME

TIKA EVENE NELSON

SEX

FEMALE

DATE OF BIRTH

MAY 18, 1960

CITY OR TOWNSHIP OF BIRTH

MINNEAPOLIS

COUNTY

HENNEPIN

PARENT(S)

MATTIE DELLA (SHAW)

JOHN LEWIS NELSON

AMENDMENTS MADE PRIOR TO MARCH 11, 2001 FOR THIS RECORD ARE NOT NOTED ON THE CERTIFIED COPY.

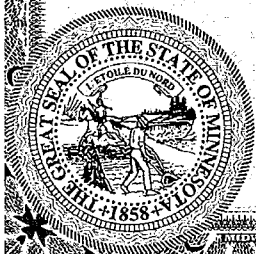
S22-000020430

THIS IS A TRUE AND OFFICIAL RECORD OF THE BIRTH REGISTERED IN THE OFFICE OF THE STATE REGISTRAR. DATE FILED: MAY 23, 1960

PLACE ISSUED: MINNESOTA DEPARTMENT OF HEALTH

DATE ISSUED: JUNE 14, 2001

Barbara A. Bedmarczyk
STATE REGISTRAR





June 15, 2016

Via Email

Matthew J. Shea, Esq.
Gray Plant Mooty
500 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

Re: Heirship Claim of Tyka Nelson

Dear Mr. Shea:

Thank you for submitting the Affidavit of Tyka Nelson Regarding Protocol Prior to Potential Genetic Testing.

With respect to the Protocol adopted by the Court, the Special Administrator's goal is to apply existing Minnesota law equally to all persons claiming to potentially be an heir of the Decedent. Such relevant law includes the Minnesota Probate Code (Minn. Stat. Ch. 524), the Minnesota Parentage Act (Minn. Stat. §§ 257.01 through 257.75) and Minnesota common law.

Under Minnesota law, if it is determined that Decedent is not the father of any living children (or their descendants), then Decedent's siblings and half-siblings (and descendants of any deceased siblings and half-siblings) may be determined to be heirs, in the event no Will is found. Minn. Stat. § 524.2-103(3). To be a sibling or half-sibling, a person must share at least one genetic parent with Decedent. *Id.* Because they were married when Decedent was born, Mattie Della (Shaw) ("Mattie") and John Lewis Nelson ("John") are presumed to be Decedent's genetic parents. Minn. Stat. § 257.55, subd. 1(a).¹ Only a very limited group of persons have standing to challenge that presumption, and, in any event, the time to make such a challenge passed long ago. Minn. Stat. § 257.57, subd. 1(b). As such, there is an irrebuttable presumption that John and Mattie are Decedent's genetic parents. *Id.*; Minn. Stat. § 524.1.201(22) and (23); *see also In re Estate of Jotham*, 722 N.W.2d 447, 455-56 (2006). Thus, to potentially qualify as an heir of Decedent as a sibling or half-sibling, the claimant must be a descendant of either Mattie or John (or both).

The materials provided by your client under oath confirm that she was born during the marriage of Mattie and John. She has also been adjudicated to be their child as part of their divorce proceeding. As such, it is the Special Administrator's determination that Tyka Nelson is Decedent's sibling as a

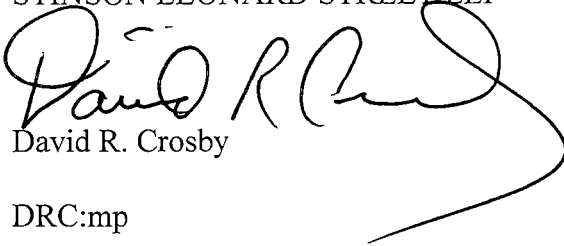
¹ Further, as part of Mattie and John's divorce, a Minnesota court adjudicated that they were Decedent's parents.

June 15, 2016
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matter of law, and that no genetic testing need take place to establish her relationship as Decedent's sibling.

Very truly yours,

STINSON LEONARD STREET LLP

A handwritten signature in black ink, appearing to read "David R. Crosby". The signature is written in a cursive style with a long, sweeping tail that extends to the right and then curves back down.

David R. Crosby

DRC:mp